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Attorney for Defendant,
7 COOL AIR REFRIGERATION, INC

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 DEBORAH ANN BRADLEY, individually,
12 Plaintiffs,

13 vs.

14 TOTAL FACILITY INC., a corporation; COOL
AIR REFRIGERATION, INC., a California
15 Corporation; DOES 1-20 and ROE BUSINESS
ENTITIES 1-20, inclusive,

16 Defendants.

17
18 TOTAL FACILITY, INC A DELAWARE
19 CORPORATION,

20 Third Party Plaintiff,

21 vs.

22
23 COOL AIR REFRIGERATION, INC. A
24 CALIFORNIA CORPORATION; DOES 21-30
DOE AND ROE BUSINESS ENTITIES 1-2,

25 Third Party Defendant.
26
27

28 ///

Case No.: 2:19-CV-01413-KJD-BNW

STIPULATION AND ORDER TO STAY
DISCOVERY

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, DEBORAH ANN BRADLEY, by and through her attorney, Christian Z. Smith, Esq., counsel for Defendant/Third-Party Defendant, COOL AIR REFRIGERATION, INC., Stacey A. Upson Esq., of The Law Offices of S. Denise McCurry and Defendant/Third-Party Plaintiff TOTAL FACILITY INC, by and through its counsel, Taylor R. Anderson, Esq. of HALL JAFFE & CLAYTON, LLP, that discovery in this matter be stayed for a period of six (6) months.

This Stipulation is based upon the following discussions between the parties:

1. Currently pending before the Court are two Motions for Summary Judgment. The parties believe based upon the current court docket, no determination on the Motions will be rendered prior to the expert disclosure deadline of December 16, 2019, and the deadline to file the Joint Interim Status Report of December 16, 2019.

2. A two week extension to Discovery responses to Plaintiff's Interrogatories and Requests for Production of Documents has been granted by Plaintiff to allow the Defendants ample opportunity to gather responsive documents.

3. Defendants have provided an extension to Plaintiff to respond to both motions up to and including, January 10, 2020 with any Replies of Defendants due on or before February 3, 2020.

4. The parties wish to avoid costly discovery, including experts, in the event the motions are granted. As a result, the instant stay is being sought in good faith.

Based upon the above, the parties respectfully request a stay of all discovery for a period of six (6) months.

DATED: Nov 26, 2019

THE LAW OFFICES OF S. DENISE
MCCURRY
BY: 

Stacey A. Upson, Esq., # 4773
7455 Arroyo Crossing Parkway, Suite 200
Las Vegas, NV 89113
Attorney for Defendant/Third Party Defendant,
Cool Air Refrigeration, Inc.

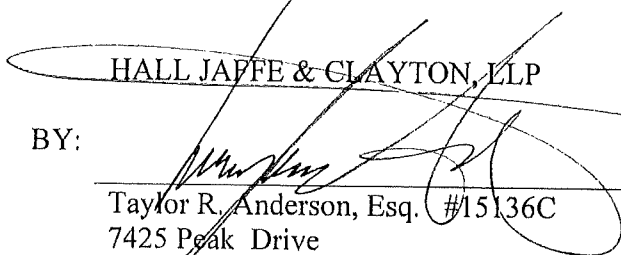
1 DATED: 11/2/19, 2019

RICHARD HARRIS LAW FIRM

BY: 

Christian Z. Smith, Esq. #8266
801 S. Fourth Street
Las Vegas, NV 89101
Attorney for Plaintiff, Deborah Ann Bradley

6 DATED: 11/20/19, 2019


HALL JAFFE & CLAYTON, LLP

BY:

Taylor R. Anderson, Esq. #15136C
7425 Peak Drive
Las Vegas, NV 89128
Attorney for Defendant/Third Party Plaintiff,
Total Facility Inc

ORDER

BASED UPON THE STIPULATION OF COUNSEL,

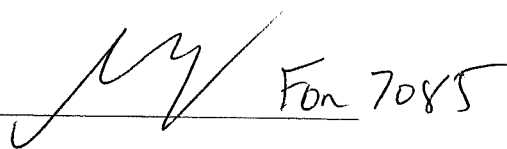
IT IS HEREBY ORDERED all discovery in this matter is stayed for a period of six (6) months.

IT IS SO ORDERED THIS ____ DAY OF _____, 2019

U.S. DISTRICT JUDGE

Respectfully Submitted,

LAW OFFICES OF S. DENISE MCCURRY

 For 7085
Stacey A. Upson, Esq. #4773
7455 Arroyo Crossing Parkway, Suite 200
Las Vegas, NV 89113
Attorneys for Defendant/Third Party Defendant,
Cool Air Refrigeration, Inc.